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February 3, 2024

BY ECF

Chief Judge Laura Taylor Swain
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Aimee Harris; 22 Cr. 457 (LTS)

Dear Chief Judge Swain:

As the Court is aware, we represent Aimee Harris in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. Sentencing is scheduled for February 5, 2024, at 2:30 p.m. Since Ms. Harris’s last appearance on January 30, 2024, we have engaged in significant efforts to assist her with the rescheduling of her sentencing, facilitating her appearance, and complying with the Court’s Order, dated February 1, 2024, instructing her “to do whatever is necessary” to appear in person on Monday for her sentencing. Based on the information below, Ms. Harris cannot appear on Monday. She is requesting that sentencing be adjourned.

Following her discharge from St. Mary’s Medical Center on January 30, 2024, Ms. Harris continued to be ill and sought medical care at Helix Urgent Care on February 2, 2024. Upon evaluation, she was instructed by medical staff not to travel for one week or until she felt better. *See* Helix Medical Records (separately filed under seal).

Aside from being ill, Ms. Harris does not have the proper identification needed to travel by air. We learned this from Ms. Harris on February 1, 2024, and immediately sought to assist her. We contacted Pretrial Services and made efforts to acquire Ms. Harris’s United States passport only to find out that it was reported as lost by Ms. Harris in 2022 to Pretrial Services in New York when she surrendered.¹ We also assisted Ms. Harris with trying to obtain an identification card from the Department of Motor Vehicles in Florida as she no longer has a driver’s license because of her arrest in July, 2023 for driving while under the

¹ We did not represent Ms. Harris at this time.

influence. However, she needs to schedule an in-person appointment with the DMV to try and obtain an identification card. As such, Ms. Harris does not have a passport, driver's license or identification card to travel by air.

Alternative forms of transportation, such as train or bus, are not possible options for Ms. Harris. While a valid passport or driver's license would not be required, as noted in the medical records from Helix Urgent Care, she has been advised not to travel by air or any other means due to illness.

Accordingly, Ms. Harris is requesting an adjournment of sentencing and permission to appear by video on Monday.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti
Kestine Thiele

The Court will supply a Teams invitation for Ms. Harris to appear by video at today's proceeding. The adjournment request is held in abeyance pending the hearing. DE#80 resolved.

SO ORDERED.

February 5, 2024

/s/ Laura Taylor Swain, Chief USDJ